

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAFAYETTE-OPELOUSAS DIVISION

JENNA B. LEBRON, PERSONALLY AND * CIVIL ACTION NO. 6:12-CV-01901
AS PERSONAL REPRESENTATIVE OF
THE DECEASED, ARTURO I. LEBRON,
AS TUTRIX OF THE MINORS, L.R.
LEBRON AND L.A. LEBRON, AND THE
MAJORS, ALFREDO O.LEBRON AND
LUISA J. LEBRON * JUDGE RICHARD T. HAIK

VERSUS

ENSCO OFFSHORE COMPANY AND
ENERGY XXI GOM, LLC

* MAGISTRATE JUDGE PATRICK HANNAN

**DEFENDANTS' MOTION IN LIMINE TO EXCLUDE
EVIDENCE OF DAMAGES NOT RECOVERABLE UNDER DOHSA**

NOW INTO COURT, through the undersigned counsel, comes defendants, EnSCO
Offshore Company and Energy XXI GOM, LLC, and hereby seek the entry of an order, pursuant
to Rules 401 and 402 of the Federal Rules of Evidence, excluding all testimony and evidence of
Plaintiffs' non-pecuniary damages which are not recoverable under DOHSA.

WHEREFORE, Defendants pray for the entry of an order in their favor as outlined
above.

DEFENDANTS' MOTION TO EXCLUDE EVIDENCE
OF DAMAGES NOT RECOVERABLE UNDER DOHSA

Respectfully submitted,

/s/ Ross Cunningham

Ross Cunningham
State Bar No. 24007062
Bryan P. Rose
State Bar No. 24044704
ROSE·WALKER, L.L.P.
3500 Maple Avenue, Suite 900
Dallas, Texas 75219
Phone: 214.752.8600
Facsimile: 214.752.8700

/s/ Randall Theunissen

Randall K. Theunissen (Louisiana Bar No. 12727)
ALLEN & GOOCH, A LAW CORPORATION
2000 Kaliste Saloom Road, Suite 400
P.O. Box 81129
Lafayette, LA 70598-1129
337.291.1240 – Telephone
337.291.1245 – Facsimile
randytheunissen@allengooch.com

**ATTORNEY FOR PHI, INC., AND ALLIANZ
GLOBAL CORPORATE AND SPECIALTY
AG**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been forwarded to all counsel of record on this 18th day of March, 2014 via this Court's ECF filing system.

/s/ Bryan P. Rose

Bryan P. Rose